

NORTHERN DISTRICT OF ILLINOIS

Lisa Del Guidice

Plaintiff

v.

All State Insurance

Defendant

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Case No. 1:22-cv-02033

JOINT MOTION OF THE PARTIES TO ALLOW SUMMARY JUDGMENT

MOTION AND HEARING BROUGHT BY DEFENDANT

Now comes the parties in the above-entitled matter and they hereby move this Honorable Court to allow Defendant to move for summary judgment and to schedule a hearing on said motion on June 2.

The parties report to the court as follows:

1. The parties have had extensive discussions about the facts and the documents.
2. It is in the interest of Judicial Economy to allow for a summary judgment hearing.
3. If the Defendant's motion is denied, Plaintiff promises the court that present counsel will have secured replacement trial counsel by June 2 and that only a short continuance after June 2 will be necessary to allow replacement counsel to be ready for trial.
4. The parties' discussions make it clear that the interpretation of the insurance policy at issue is for the court, not for a jury and that fact may lead to disposition without trial.

The Plaintiff,
Lisa Del Guidice
By her attorney
/s/ Robert D. Loventhal
Robert D. Loventhal, Esq.

The Defendant,
Allstate Indemnity Company
By its attorney
/s/ Mark B. Ruda
Mark B. Ruda, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025 a copy of the foregoing was served upon all parties or their counsel of record by electronic mail via efile-IL.

A handwritten signature in black ink, appearing to be 'R. Loventhal', written in a cursive style.

Robert D. Loventhal